

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

HEARING DATE: October 29, 2019
HEARING TIME: 2:00 p.m.
HEARING PLACE: Syracuse

**IN RE: MARY ELLEN GALLUP,
CHRISTOPHER GALLUP,**
(SSN xxx-xx-6524; xxx-xx-1853)

Debtors.

Case No. **18-31466**
CHAPTER 13

OBJECTION TO CONFIRMATION

The Trustee objects to confirmation of the amended plan filed October 1, 2019 [#44-1], in the above named Debtors' case for the following reason(s):

I. NOT FILED PROPERLY

The amended plan was improperly filed as an attachment to a *Notice of Pre Confirmation Amendment to Chapter 13 Plan* [#44] rather than as a separate docket entry.

II. FEASIBILITY

The amended plan is not adequately funded and appears to be short approximately \$16,518.00. Plan payments need to be increased to \$1,080.00 per month for the remaining 49 months.

III. FAILURE TO FILE CERTIFICATION

A Certification Pursuant to Local Bankruptcy Rule 3015-1 has not been filed.

WHEREFORE, the Trustee respectfully requests that Confirmation be denied and for such further relief as the Court deems appropriate.

Dated: October 21, 2019
Syracuse, New York

/s/ Lynn Harper Wilson
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